

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”
Defendants.

CASE NO.:

JURY TRIAL DEMANDED

COMPLAINT

This is a civil action for damages against YouTube and its parent company, Google, James Jackson known online as “Onision,” and Lucas Jackson, formerly known online as “Laineybot,” “Lainey,” and “Kai,” under the federal statutes 18 U.S.C. § 1595, Trafficking Victims Protection Reauthorization Act, 18 U.S.C. § 2255, Civil Remedies for Personal Injuries, and related state law claims arising from Defendant’s conduct when it granted an agency and/or profit-sharing relationship to a predator, Onision, that used YouTube to identify, recruit, solicit, and groom, children, and coordinated with his spouse, Lainey, to lure, entice, and solicit children for the ultimate goal of engaging in sexual activity with them. Plaintiff was one of these victims. Plaintiff respectfully submits her complaint for damages and makes the following averments:

INTRODUCTION

1. This lawsuit will reveal how Google's YouTube Partnership Program through the YouTube platform enabled, facilitated, and profit-shared in the identification and grooming of vulnerable children by two adult predators known as Onision and Lainey.

2. Defendant James Jackson, a/k/a "Onision," is a predator who, when faced with the allegations raised against him, began a series of attacks against the victims online in an effort to intimidate and threaten his victims into silence.

3. Defendant Lucas Jackson, a/k/a "Laineybot," "Lainey" or "Kai," is married to James Jackson, a/k/a "Onision," and used new fame as Onision's spouse to lure and entice underage children to engage in sexual acts and exchange Child Sexual Abuse Material ("CSAM")¹ images with her online.

4. All predators must identify vulnerable individuals that could become their potential victims. Once a victim, or a pool of victims is identified, the predator must find a way to recruit, lure, entice, and corral those victims into their web so that the predator might snare them for his illicit purpose.

5. Part of ensnaring a victim is a process called grooming.

6. "Grooming" is a deceptive process, enacted by a would-be abuser, in

¹ While federal statutes still use the phrase "child pornography," that phrase does not adequately reflect the true nature of exploitation and the images of children reflected in them. As such CSAM more accurately reflects these materials and this complaint shall use the phrase CSAM.

which the perpetrator selects a victim, gains access to and isolates the victim, develops trust and/or dependency in the victim's mind, and desensitizes the victim to sexual content and physical contact.²

7. A sophisticated predator is skilled at creating confusion, deception, and doubt, but simultaneously gaining trust, acceptance and affection or love from the victim. A predator will charm others and convince the responsible adults around their victim (or intended victim) that nothing is amiss or should be concerning.³

8. James Jackson, also known by his internet persona, "Onision," ("Onision") created a channel on Google's YouTube platform in 2006 and began posting to it in October of 2007.

9. YouTube is an online global video sharing and social media platform.

10. YouTube is the second most visited website, only second to Google search.

11. YouTube has more than 2.5 billion users monthly, making YouTube one of the largest social media companies in the world.⁴

12. YouTube has an unprecedented social impact and has influenced popular

² Elizabeth Jeglic, Ph.D. and Cynthia Calkins, Ph.D., *Protecting Your Child from Sexual Abuse: What You Need to Know to Keep Your Kids Safe* (Feb. 13, 2018).

³ Malcolm Gladwell, *In Plain View, How Child Molesters Get Away with It*, The New Yorker (Sept. 17, 2012), available at <https://www.newyorker.com/magazine/2012/09/24/in-plain-view>.

⁴ Dixon, S., *Most popular social networks worldwide as of January 2022, ranked by number of monthly active users*, Statista (July 26, 2022), available at <https://www.statista.com/statistics/272014/global-social-networks-ranked-by-number-of-users/>.

culture, internet trends, and has allowed the rapid spread of video media worldwide at the click of a button.

13. Certain YouTuber's rose in popularity quickly and gained celebrity status amongst their viewers.

14. Onision quickly became known for his following and began creating and posting videos to YouTube. He rapidly became widely known for his commentary, some of which was objectifying, offensive, and controversial.

15. At his peak, Onision had over 2 million subscribers.

16. Onision targeted underage girls online and provided material that appealed to that age group, such as comments on body image, appearance, self-identity, suicide ideology, and similar topics. Onision would also rate and comment on pictures of people and their bodies, often sent to him by young teen girls.

17. Specifically, Onision appealed to minor females, like Plaintiff, who were young, vulnerable, questioning their self-image or identity, or were seeking answers and guidance.

18. YouTube's product and non-neutral algorithm specifically targeted minors with these interests and suggested Onision's harmful and controversial content to minor teen users.

19. In 2009, Onision gained huge popularity online after his release of the "Banana Song," which went viral with over 90 million views, and was featured on national television in 2010.

20. At the same time, Onision's popularity was attributable to his

commentary and skits portraying other YouTubers.

21. Onision became a famous and popular YouTuber on the platform and became monetized.

22. When a person becomes monetized, YouTube and that person sign a YouTube Partner Program (YPP) contract, which forms an agency and/or profit-sharing relationship.

23. Joining the YPP is optional, but if someone becomes a YouTube Partner, Google handles all the advertising placement, revenue collection, and pays the YouTube partner their portion of the profits, pursuant to the contract signed.⁵

24. As a member of the program, Google “matches [the YouTube Partner’s] videos with advertisers, decides what ads will appear, and keeps track of all traffic (views), as well as ad responses. YouTube then pays [the YouTube Partner] accordingly for [their] participation in the Partner program.”⁶

25. YouTube Partners agree to follow and abide by the YouTube Terms of Service and Community Guidelines.

26. A YouTube Partner that fails to comply with the YouTube Terms of Service and Community Guidelines can be demonetized or have their video removed, among other penalties.

⁵ Rich, Jason, *How to Become A YouTube Partner*, Entrepreneur (Dec. 19, 2013), available at <https://www.entrepreneur.com/science-technology/how-to-become-a-youtube-partner/229919>.

⁶ *Id.*

27. Onision ran several YouTube channels, to include but not limited to Onision, OnisionSpeaks, UhOhBro, OnisionEncore, OnisionArchive, Laineybot (later changed to CoolGuyKai).

28. Upon information and belief, all of these channels were monetized under the YPP.

29. Onision used his fame and platform to objectify children, to form relationships with underage girls, to entice them, groom them, and to arrange transportation across state lines and facilitate further grooming and sexual activity.

30. Onision began pursuing 17-year-old Taylor Anderson (“Lainey” or “Kai”), who went by the internet persona of “Laineybot.” Taylor legally changed her name several times and currently goes by the legal name, Lucas Jackson.

31. In November of 2012, Lainey and Onision got married.

32. After Onision introduced Lainey to his followers, Lainey instantly became a part of the Onision channel and gained fame through her marriage.

33. Lainey began flirting with and grooming underage girls that were fans of Onision through the YouTube platform, including but not limited to the Onision channels and forums.

34. Those same girls were then invited to Lainey and Onision’s home with the intent to engage in sexual acts and three-way sexual encounters with the couple, or for additional grooming to achieve the ultimate goal of sexual conquest by Lainey and/or Onision.

35. YouTube was put on notice many times that Onision was violating the

YouTube Terms of Service and Community Guidelines, but YouTube took no action to deter or demonetize Onision based on the numerous complaints or violative content he posted.

36. YouTube was receiving value and profit-sharing with Onision on violent and harmful content, as well as content used to lure, entice, and recruit underage girls.

37. YouTube continued to allow their partner, Onision, to post his content, which in turn recruited, lured and enticed Sarah to reach out to Lainey through the Onision forums.

38. Sarah came to know who Lainey was by watching the Onision channels and saw her as a celebrity because she was married to Onision.

39. Lainey later befriended 14-year-old Sarah online.

40. After flirting with and grooming Sarah for two years, Lainey and Onision invited Sarah to visit them at their home in Washington State.

41. Over the next few years, Sarah visited several times on or about the following dates:

Visit No.	Dates of Travel	Sarah's Age	Lainey's Age	Onision's Age
1	9/15/2016 – 9/20/2016	16	21	30
2	10/26/2016 – 2/21/2017	16	22	30-31
3	4/5/2017 – 4/13/2017	16	22	31
4	8/1/2017 – 11/7/2017	16-17	22-23	31
5	7/4/2018 – 8/25/2018	17-18	23	32
6	12/12/2018 – 12/29/2018	18	24	33
7	1/16/2019 – 1/20/2019	18	24	33
8	2/16/2019 – 2/20/2019	18	24	33
9	6/30/2019 – 7/8/2019	18	24	33
10	7/17/2019 – 7/23/2019	18	24	33

42. During these visits, Onision and Lainey (Sarah's guardian) groomed Sarah, a minor child, by constantly exposing her to:

- a. Sexual commentary,
- b. Sexual jokes,
- c. Physically touching her legs, buttocks, breasts, and body,
- d. Comments about the way her body looked,
- e. Discussions about "being together" or "running away together"
- f. Vacillation in the way she was treated to create fear, anxiety, uncertainty, and a desire to please,
- g. Exposure to sex acts with other partner(s), and
- h. A perpetually sexually charged environment.

43. After years of being groomed and sexualized by Lainey and Onision, Sarah was raped by Onision at the age of eighteen (18).

44. After violating her, Onision fell into a pattern of victim shaming, in which he has published statements claiming that Sarah raped *him* and that she is a felon. Both of these statements are untrue.

PARTIES

A. Plaintiff.

45. Sarah is a resident of Michigan and is *sui juris*.

46. Sarah was a minor for the majority of the time that she was sex trafficked. She became an adult in the latter portion of being sex trafficked and was raped and

defamed as an adult.

47. Because Defendants' victimization of Sarah is part of sex trafficking conspiracy, Sarah reasonably fear retaliation from Onision and stalking or harassment from other members of the online community, as many of Onisions's fans have targeted others women that were opposed to Onision.

48. Sarah's safety, right to privacy, and personal security outweigh the public interest in knowing her identification.

49. Any public comments Sarah has made have only been done with her first name and not her last.

50. It is in the public's interest to give anonymity to sexual abuse and sex trafficking survivors so that other victims will feel the ability to come forward and not be fearful that their identity will be publicized.

51. Sarah's legitimate concerns for privacy outweigh any prejudice to Defendants or the public by allowing Plaintiff to proceed anonymously.

B. Defendants.

52. Defendant James Jackson is a resident of the State of Washington and is *sui juris*. Jackson is also known by his online persona "Onision," and before he changed his name, his name was Gregory James Jackson.

53. Defendant Lucas Jackson is a resident of the State of Washington and is *sui juris*. Lucas Jackson was formerly known by her online personas as "Laineybot," "Lainey," and "Kai," and before he changed his name multiple times, his former

names included Kai Jackson, Taylor Anderson, and Taylor Avaroe.

54. Defendant Google LLC (“Google”) is a Delaware limited liability company with its principal place of business in Mountainview, California.

55. Defendant YouTube LLC is a Delaware limited liability corporation with its principal place of business in Mountainview, California.

56. Since 2006, Google has operated YouTube.

57. Defendants Google and YouTube are referred to jointly as “YouTube.”

58. At all relevant times, YouTube designed, maintained, manufactured, marketed, advertised, promoted, owned, operated and distributed the social media platform YouTube.

JURISDICTION AND VENUE

59. This Court has federal question subject-matter jurisdiction, pursuant to 28 U.S.C. § 1331, because Plaintiffs bring this action under 18 U.S.C. §§ 2255 and 1595.

60. This Court has diversity subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and the parties have complete diversity, insofar as Plaintiff is a Michigan resident, Defendants Onision and Lainey are Washington residents, and Defendant YouTube is a Delaware LLC that has its principal place of business in California.

61. This Court has personal jurisdiction over the Defendants because they have committed the acts complained of herein in this State and in this District.

68. Nearly three decades ago, Congress passed the Communications Decency Act of 1996 (“CDA of 1996”) which included Section 230 (“CDA 230”).⁷

69. Congress intended that CDA of 1996 would accomplish several things, to include: (1) to promote the free exchange of information and ideas over the internet and (2) to encourage voluntary monitoring for offensive or obscene material.⁸

70. Since its passage, the Internet has grown and is now no longer a fragile new means of communication, but rather is the predominant medium of communication and commerce nationwide, if not in the world.

71. In 2018, Congress passed a bill known as Fight Online Sex Trafficking Act (“FOSTA”) in which Congress clarified that CDA 230 was never intended to offer an immunity or liability shield for criminal conduct, such as sex trafficking, prostitution, or the exploitation of children that occurred on or through online platforms.

GOOGLE’S YOUTUBE PLATFORM, BUSINESS MODEL, AND CONTENT MODERATION POLICIES AND PRACTICES

72. YouTube is an online global video sharing and social media platform and was the second most visited website in the world in 2022, only second to Google search.

73. YouTube has more than 2.5 billion users monthly, making YouTube one

⁷ 47 U.S.C. § 230.

⁸ 47 U.S.C. § 230(b).

78. YouTube, which saw approximately \$20 billion in profits in 2020 and approximately \$28 billion in 2021, accumulates a massive amount of revenue from its advertising.¹²

79. Between March 2020 and February 2021, YouTube's top 10 advertisers spent over \$1 billion.¹³

80. In order to increase advertising revenue, YouTube has created a platform which allowed any person that wants to create content on YouTube to have the ability to achieve fame, popularity, and monetization if they meet the eligibility criteria to join the YouTube Partnership Program ("YPP").

81. The eligibility requirements of the YPP require that the applicant obtain 1000 subscribers with 4000 valid public watch hours in a 12-month period of time. Once eligibility is achieved, YouTube will review the channel to determine if it conforms with the Community Guidelines, and then allow the user to become monetized.¹⁴

alphabet_10K.pdf.

¹² Graham, Megan, et al., *How Google's \$150 billion advertising business works*, CNBC (Oct. 13, 2021), available at <https://www.cnbc.com/2021/05/18/how-does-google-make-moneyadvertising-business-breakdown-.html>; Id.

¹³ Statista, *Leading YouTube advertisers in the United States between March 2020 and February 2021 by advertising spending* (May 31, 2022), available at <https://www.statista.com/statistics/1112288/us-youtube-advertisers-ranked-by-ad-spend/>.

¹⁴ YouTube Help, *You Tube Partner Program overview & eligibility*, (last viewed January 16, 2023), available at <https://support.google.com/youtube/answer/72851?hl=en#zippy=%2Cwhat-happens-if-my-counts-drop-below-the-threshold-after-i-apply%2Cim-no-longer-in-ypp-or-i-was-never-in-the-program-and-im-seeing-ads-on-my-videos-am-i-earning-revenue-from-those-ads>.

82. The YPP applicant signs a contract with YouTube in which they become a Program Partner (“YouTube Partner”) and YouTube agrees to profit share with the YouTube Partner. For advertising revenue, YouTube pays the YouTube Partner 55% of advertising revenue from their page, and YouTube keeps 45% of the advertising revenue.¹⁵

83. Joining the YPP is optional, but if someone becomes a YouTube Partner, Google handles all the advertising placement, revenue collection, and pays the YouTube partner their portion of the profits, pursuant to the contract signed.¹⁶

84. As a member of the YPP, Google “matches [their] videos with advertisers, decides what ads will appear, and keeps track of all traffic (views), as well as ad responses. YouTube then pays [that person] accordingly for [their] participation in the Partner program.”¹⁷

85. YouTube offers their YouTube Partner special tools to improve and further monetize their page.

86. YouTube Partners agree to follow and abide by the YouTube Terms of Service and Community Guidelines.

87. A YouTube Partner that fails to comply with the YouTube Terms of Service and Community Guidelines can be demonetized or have their video removed,

¹⁵ Id.

¹⁶ Rich, Jason, *How to Become A YouTube Partner*, Entrepreneur (Dec. 19, 2013), available at <https://www.entrepreneur.com/science-technology/how-to-become-a-youtube-partner/229919>.

¹⁷ Id.

among other penalties.

88. YouTube also “recommends” content through their algorithm. Not all videos are recommended; rather, the YouTube algorithm seeks to prioritize videos with high watch time and video performance.¹⁸

89. Google is, in part, an advertising broker, selling attention to companies that will pay for it, and the longer people stay on YouTube or access its recommended content, the more money YouTube and its parent companies make.

90. Google has the ability to, and in fact has, demonetized some of its YouTube Partners in the past for violating the YouTube Terms of Service and Community Guidelines.

91. Platforms like YouTube have learned that outrageous, tortious, and divisive content drives users and profits.

92. YouTube’s recommendation system is responsible for generating the majority of all user viewing time on the platform and much of the most interacted with materials involve controversial, intense, violent, and extreme views.¹⁹

¹⁸ Sweatt, Lydia, *YouTube Algorithm Guide: How Your Videos Are Recommended to Viewers*, VidIQ (Apr. 20, 2021), available at https://vidiq.com/blog/post/how-youtube-algorithm-recommends-videos/?utm_source=google&utm_medium=cpc&utm_campaign=17815400597__s-pmax-en-us-top_&utm_content=&utm_term=&a=1103&source=17815400597__s-pmax-en-us-top_&aff_sub=google&aff_sub2=cpc&aff_sub3=&aff_sub4=&afmc=1yc&gclid=Cj0KCCQiAiJSeBhCCARIsAHnAzT_DD_4_1wK-i8NzIicn9-1yqusnbQbD2C2x0PHXlnjVE2fJAVUXKuMaAt9nEALw_wcB.

¹⁹ Zeynep Tufekci, *YouTube, the Great Radicalizer*, N.Y. Times (Mar. 10, 2018), at 6, available at <https://www.nytimes.com/2018/03/10/opinion/sunday/youtube-politics-radical.html>.

93. Defendant YouTube pays its YouTube Partners to create content because it benefits from increased user activity, which in turn increases advertising revenue, and other promotional revenue sources.

94. A former Google executive was quoted in the Wall Street Journal saying: “There’s this idea that the search algorithm is all neutral and goes out and combs the web and comes back and shows what it found, and that’s total BS.”²⁰

95. More than 70% of the videos watched on YouTube are videos recommended by YouTube’s non-neutral algorithm in an effort to drive user engagement and therefore advertising profits.²¹

96. YouTube allows YouTube Partners to monetize their platforms on its product to generate revenue for itself and its users, including YouTube Partners that violate the Community Guidelines and laws prohibiting the sexual exploitation of children.

97. YouTube’s product was built to promote hateful, harmful, and controversial content as it is the most engaging to users, including its minor users.²²

²⁰ Grind, Kristen, et al, *How Google Interferes with Its Search Algorithms and Changes Your Results*, Wall Street J. (Nov. 15, 2019), available at <https://www.wsj.com/articles/how-google-interferes-with-its-search-algorithms-and-changes-your-results11573823753>.

²¹ E.g., M. Faddoul et al., *A Longitudinal Analysis of YouTube’s Promotion of Conspiracy Videos*, arXiv: 2003.03318 (Mar. 6, 2020), available at <https://arxiv.org/abs/2003.03318>.

²² Lewis, Paul, *Fiction is Outperforming Reality: How YouTube’s Algorithm Distorts Truth*, The Guardian (Feb. 2, 2018), available at <https://www.theguardian.com/technology/2018/feb/02/howyoutubes-algorithm-distorts-truth>.

98. YouTube in turn pays its YouTube Partners a range of \$0.50 to \$6 USD per 1,000 views on any video, including materials depicting minors in violation of sex trafficking and child pornography laws, as well as other criminal statutes.²³

99. YouTube has employed a tiered revenue-sharing governance. Non-monetized general users of the platform were being given far more freedom than YouTube Partners, who were bound by their YPP Agreement and were required to ensure their content was “advertiser-friendly.”²⁴ After all, the very purpose of the YPP was to increase profits from YouTube advertising by employing the content producers that were valuable to YouTube and had the potential to increase their revenue.

100. Some YouTube Partners have used their YouTube platform, in a profit-sharing partnership with YouTube, to facilitate sex trafficking and build a pool of children from which to select and groom their next victim from within.

101. YouTube actively monitors where it appears in the news and sends a daily email to its employees detailing this coverage. This has been referred to by the moniker, “The Nightmare Fuel.”

²³ See YouTube, *How YouTube creators earn money - how YouTube works*, YouTube, (last visited Dec 1, 2022), <https://www.youtube.com/howyoutubeworks/product-features/monetization/#:~:text=Monetization%20for%20Creators,Overview&text=YouTube%20Creators%20are%20individuals%20who,%2C%20merchandise%20sales%2C%20and%20subscriptions>.

²⁴ Caplan, Robyn and Tarleton Gillespie, *Tiered Governance and Demonetization: The Shifting Terms of Labor and Compensation in the Platform Economy*, Sage Publishing (April-June 2020), available at <https://journals.sagepub.com/doi/pdf/10.1177/2056305120936636>.

**THE RISE OF ONISION TO BECOME ONE OF
YOUTUBE'S MOST INFLUENTIAL PERSONAS ONLINE,
ALONG WITH HIS SPOUSE, LAINEY**

102. On January 29, 2006, Onision started a YouTube channel and began posting to it on October 17, 2007.

103. Onision became known quickly for his content and began creating and posting videos to YouTube. He quickly became known for his commentary, some of which was humorous, and some of which was objectifying, offensive, and controversial.

104. Onision targeted underage girls and provided content that appealed to that age group, such as comments on body image, appearance, self-identity, suicide ideology, and similar topics. Onision would also rate and comment on pictures of people and their bodies, often sent to him by young teen girls.

105. Despite push back from the online community about Onision's damaging and negative commentary to young teen girls, he rebuffed it by claiming he was being "honest."

106. He also posted content that he claimed was comedy, but was actually a smear campaign against his ex-girlfriends and an effort to publicly humiliate them.

107. On August 5, 2005, Onision married his first wife, Skye Jackson ("Skye").

108. Upon information and belief, shortly after their marriage, Onision began to isolate Skye and prevent her from associating with friends and family.

109. Onision produced several online videos with Skye, some on YouTube

and some on other websites.

110. In 2009, Onision was discharged from the Air Force. It was after his discharge that he began seriously pursuing a YouTube career.

111. In 2009, Onision hit ultimate popularity online with his release of the Banana Song, which went viral with over 90 million views, and was featured on Comedy Central series Tosh.O in 2010.²⁵ Skye participated in this video.

112. Onision targeted minor audiences on YouTube and specifically targeted minors with emotional vulnerabilities and pre-existing traumatic experiences such as eating disorders, suicidal ideations, mental health disorders, and more.

113. At the same time, Onision rose in popularity because he was commenting on and doing skits portraying other YouTuber's, including popular YouTuber, Shane Dawson.

114. In 2010, Onision and Skye divorced.

115. As Onision's popularity grew, he gained enough popularity that he was able to participate in YouTube's Partnership Agreement, which allows a YouTuber that has gained a certain number of followers to monetize their platform and make money from the content that is posted.

116. As of the filing of this lawsuit, Onision has been in the Partnership

²⁵ *Onision, Banana Song (I'm a Banana)* (Sept. 25, 2009), <https://www.imdb.com/title/tt7030624>; Tosh.O, Comedy Central, *This Week's Viewer Video: I'm a Banana* (Feb. 4, 2010), <http://tosh.comedycentral.com/blog/2010/02/04/this-weeks-viewer-video-im-a-banana>.

Program for approximately a decade and has monetized his videos during this time period and all relevant time periods.

117. During his tenure as a member of YouTube's Paid Partnership Program, Onision posted videos and other content specifically targeting teen users and their insecurities—with certain video titles tailored to teenage concerns, including:

“Am I Pretty?;

Am I Ugly or Not?;

Should People Shave Their Legs (and Arms and "Down There");

How to Flirt With Guys;

How to Tell if You're Circumcised;

How to Ask Someone to Date You;

How Skinny is Too Skinny?;

How to Give a Hickey.”

118. The internet community began to take issue with Onision's content as early as 2012.

119. In January of 2012, Onision published a video about one of his ex-girlfriends in which he stated that because she had slept with more than 20 people before him, she was a “slut” who cannot be raped.²⁶

120. As a result of this video, numerous people asked YouTube to revoke his YPP Agreement.

²⁶ Eordogh, Fruzsina, *YouTuber inflames viewers with rape comments*, The Daily Dot (Jan. 25, 2012), available at <https://www.dailydot.com/unclick/onision-rape-vidcon-haters-youtube-banned/>.

121. Shortly after this occurred, viewers signed a Change.org Petition to demonetize Onision which was sent to YouTube.

122. Many viewers reported Onision's accounts to AdSense, which is a Google program that matches ads to the individual YouTube website based on content and visitors and coordinates the advertising makeup that allows for the monetization of a YouTube Partner's website. Since it is a Google program, a report to AdSense is effectively a report to Google.

123. One reporter in particular specifically flagged for Google that not only was this video harmful, but stated amongst other comments about Onision:

“. . . I'm disgusted by his recent videos and, despite his attempt at an apology, I do not believe he is actually sorry, or actually will change his behavior in the future. It seems to me that this is part of a cycle of his, where he makes several videos that deeply offend a percentage of his fans and viewers, he receives a backlash by those affected by his judgmental comments, he rants about them and dismisses them as "haters," and then he finally apologises to save face and tries to cover it up by deleting the videos. Only the damage is already done, it's far too late for an apology. His young, impressionable followers have already swallowed his opinions whole and committed to them as gospel. It is also a very cheap way to rack up views and collect ad revenue.

Sponsoring these videos is condoning his destructive behaviors. I can't imagine that you, or the companies that advertise with you, support such opinions. Revoking his sponsorship will send the message that you do not take this lightly, and that you respect the people who are watching the ads that you attach to these videos . . .”²⁷

²⁷ “Money-Mud,” *Stand Against Onision's Hateful Behavior*, Tumblr (Jan. 2012), available at <https://money-mud.tumblr.com/post/16044152816/amp>.

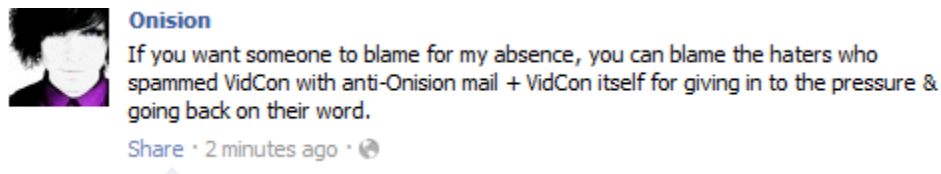
124. Many viewers flagged the offensive video online through YouTube.

125. Viewers wrote to VidCon, an upcoming convention at which Onision was scheduled to speak at.

126. YouTube took no action and did nothing to enforce their Terms of Service and Community Guidelines or force Onision to stop posting content that violated these guidelines.

127. Instead, YouTube continued to enable and reward Onision for his harmful and volatile content by allowing him to continue in the YouTube Partnership Program and profit-share with YouTube.

128. On January 20, 2012, VidCon acted differently however, and responded to the communication received by removing Onision as a speaker at VidCon and banning him from attending. Onision responded on social media acknowledging this:



129. Despite all of this, Onision's YouTube partnership remained intact, YouTube took no action, and Onision's content escalated. He continued to use his channel to lure and entice young, vulnerable teenagers and then groomed them with his messaging.

Onision Groomed and Exploited Shiloh

130. Upon information and belief, around the same time that Onision and

Skye were ending their marriage, a sixteen (16) year old fan named Shiloh reached out to Onision and began speaking with him. At the time, Onision was 25 or 26 years old.

131. Upon information and belief, Onision began grooming Shiloh.

132. Upon information and belief, consistent with his grooming pattern, Shiloh and Onision began conversing frequently, sometimes over eight (8) hours a day, and Onision built trust by acting as her best friend and confidant.

133. Upon information and belief, Onision and Shiloh spoke about meeting to engage in sexual activity with each other.

134. Upon information and belief, Onision told Shiloh he wished to engage in sexual intercourse with her, knew that they could get in legal trouble for doing so, and elected to do so in Pennsylvania because of their age of consent laws.

135. In December 2011, Onision travelled to Pennsylvania first by car.

136. When he crashed his car, he was not deterred from traveling to have sex with Shiloh. Onision then got on an airplane and flew to Pennsylvania for the purpose of engaging in sexual activity with this minor child.

137. Upon arrival at Shiloh's hotel room, he engaged in sex acts with seventeen-year-old Shiloh.

138. Upon information and belief, during their time together, Onision engaged in rough and derogatory acts during sex that caused her pain. Shiloh's pain and discomfort, medical complications, nor her consent (or lack thereof) deterred Onision's incessant sexual demands and desires.

139. After they broke up, Onision used his online platform to harass, berate

and humiliate Shiloh, which resulted in some of his fans reaching out to her to harass her on as well on his behalf.

140. Part of Onision's messaging was to silence Shiloh's voice and warn others from speaking out against him.

Onision Formed his partnership with Lainey,²⁸ who Assisted in His Grooming and Recruitment of Underage Girls.

141. When Lainey was an underage girl, she began fangirl messaging Onision for several months.

142. On February 12, 2012, Lainey, who at the time was a minor child named Taylor, used the online screenname of "Lainey" or "Laineybot."

143. Lainey and Onision connected online. Here is one such example of how they connected:



144. While Lainey was still 17 years old, Lainey and Onision began a relationship.

145. On November 14, 2012, Lainey and Onision got married.

²⁸ Pronouns will be used based on the timing of what is discussed. In 2012, Lainey identified as a female and female pronouns will be used when discussing that time frame. In 2019, Lainey changed genders to identify as male, and male pronouns will be used when discussing events after that time period.

146. Onision and Lainey began working together to groom and lure underage girls through Onision's online platforms.

147. Onision's YouTube channels gave him the fame, platform, and megaphone to reach countless people. The content he discussed attracted young teenage girls.

148. As his wife, Lainey became a part of the Onision story and gained popularity and attraction by many of Onision's followers.

Onision Forums Promoted and Enabled Predatory Behavior

149. Onision created Onision Forums that he promoted in every, or almost every, video posted to his YouTube channels.

150. In his videos on his monetized platform, Onision invited his extremely young follower-base to message him on his forums.

151. In some videos, Onision invited the same follower-base to submit photos of their bodies for him to "rate" through the Onision forums.

152. Onision would then comment on what was said to him and the young teen body videos on his YouTube channel.

153. Pursuant to the terms of the YPP, YouTube would profit-share with Onision for these vides.

154. The Onision Forums were overseen by Onision and Lainey. Any moderators on the forums answered to Onision and/or Lainey who ultimately controlled the tone and what was permissible on the forums.

155. Minors and impressionable young teens were the primary age group that

were drawn to Onision's YouTube channels.

156. Lainey's presence in Onision's life became a major draw for their young fan base as well. In fact, many Onision fans became far more invested when Lainey joined Onision's channel and his life.

157. Onision and Lainey published many forum topics, inviting their followers, including their child followers to respond, such as:

“What age does Greg think you are?

Rate me from 1 to 10

Would Laineybot date you?

Hot or not, Laineybot chooses.

Marry, ****, or kill

Are your boobs actually too big/small?

What is Onision's Opinion on you?

Would you date me?

Makeup or no makeup

Hot or not

Show off your Body Abnormalities

What does Lainey think about your body?”

158. Young people, including minors, would join the forums in the hopes that Onision and/or Lainey would communicate with them, which they sometimes did.

159. Moderators were selected to operate as volunteers and oversee the forums.

160. Some of the moderators were children themselves.

161. These volunteer moderators answered to Onision and/or Lainey and Onision and/or Lainey controlled the content and what or who was ultimately banned or removed.

162. The volunteer moderators never received training or genuine guidance on how to properly moderate the forums to prevent predators from communicating with the minor children on the forums, what grooming looks like, and other policies to keep the forums safe.

163. The Onision Forums had no specific rules or terms of conduct and the forum operated like the wild west. If any rules did exist, they were not enforced.

164. Onision turned around and commented on what was said in the forums in his YouTube videos.

165. Onision's acknowledgement of commentary from his fans in his YouTube videos caused his fans to be more eager to send him content and reach out. This further increased his reach within his pool of victims.

*Lainey Groomed, Lured, and Recruited Regina*²⁹

166. Lainey and Onision began speaking to vulnerable young people, they invited them to meet, they gained their trust, and then they exploited them. One such

²⁹ Regina uses non-binary pronouns of "they/their/them." In an effort to be clear that Regina is being referenced as a singular person instead of in the plural context, singular female pronouns will be used in this document. This is intended to achieve precise clarity, to avoid confusion, and is done with Regina's consent.

young, vulnerable person was Regina.

167. Regina turned 15-years-old approximately one month after meeting Lainey, who was an adult.

168. Regina and Lainey formed a close relationship in which Lainey flirted, groomed, and conditioned Regina when she was 15-17 years old.

169. Lainey frequently had highly sexualized conversations with Regina.

170. Lainey and Onision made it known through their YouTube videos that Lainey was bisexual, the couple was open to a polyamorous relationship, and they were seeking female partners to be with Lainey and Onision.

171. Lainey started a dating relationship with Regina in October of 2014, while Regina was 16 years old.

172. In 2015, Lainey encouraged 17-year-old Regina to visit her and Onision together. Her purpose was to have Regina engage in sexual acts with the couple.

173. Regina, being young and naïve, desperately wanted to visit Lainey, but Regina's mother would not let her travel.

174. When Lainey and Onision realized Regina could not visit them and feed Onision's sexual appetite, Regina was "replaced" with Sarah.

Onision and Lainey Groomed, Lured, and Recruited Sarah at Same Time

175. As a young girl, Sarah had a troubled home life and was both depressed and suicidal.

176. During this time, Sarah found Onision's channel on YouTube and was attracted to the topics, as they spoke about self-harm and self-image.

177. Sarah became a fan of the Onision Speaks channel, and in 2012, became even more of a fan when Lainey was introduced as Onision's significant other.

AGE 13

178. At age 13, Sarah reached out to Onision and Lainey on their Twitter page via her own handle. Sarah began responding to the posted Tweets, to which Lainey would usually respond.

179. Around the same time, Sarah joined a Kik chat group for Lainey fans and became friends with Regina through this group.

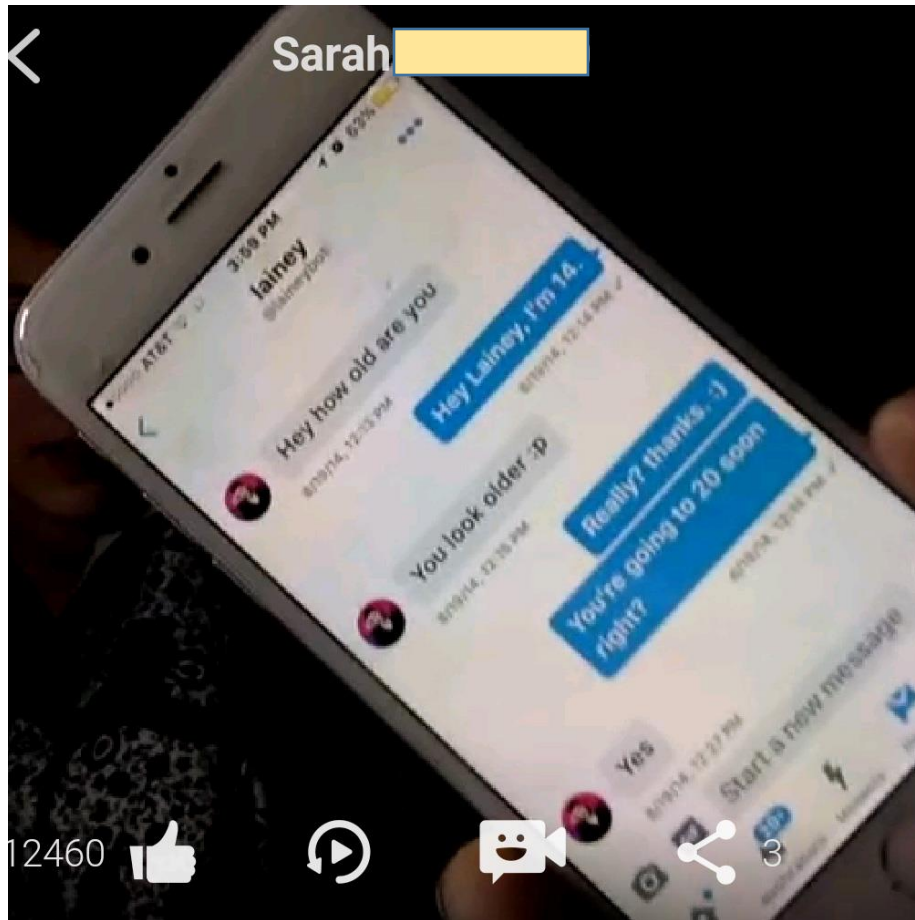
180. Regina had been appointed the moderator of this group and Lainey had become very close with Regina at this point.

AGE 14

181. In the grooming process, predators will use one victim to access other victims and to invoke loyalty and trust in their victims by making loyalty and trust extremely desirable traits that the perpetrator rarely gives out.

182. Lainey asked Regina about her friend, Sarah, and wanted to know if Sarah was "trustworthy." Regina "vouched" for Sarah.

183. In August of 2014, Lainey messaged Sarah on Twitter directly and asked her age. Sarah stated she was 14 years old, as shown below:



184. Shortly prior to this, Sarah and Lainey had recently started messaging on KIK and Lainey had told Sarah she found her “cute.”

185. At this same time, Lainey was 19 years old, about to turn 20 years old.

186. Given Sarah’s vulnerabilities, she embraced the positive attention she was receiving from Lainey and couldn’t believe that a “famous” person cared about her and wanted to be her friend.

187. When Lainey and Sarah first began speaking, Lainey identified as a straight, married woman.

188. As a result, Sarah did not understand that she was being groomed by Lainey, as she believed sexual contact could never result from these conversations.

190. When grooming minors, many predators will talk about sex with their target to desensitize the child so that sexual commentary feels normal and common place. Such desensitization allows the predator to more easily move to the next step in the grooming process.³⁰

192. Lainey added a bear and a heart emoji next to Sarah's name in her own phone, as well as red lipstick next to Regina's name in her phone, showing how she views these two minor children:



194. Because of the heavy sexual content in the conversations, the flirtations,

32

the attention, and Sarah's own vulnerabilities, 14-year-old Sarah began to have romantic feelings for Lainey.

195. Lainey discussed sexuality with her, to include sexual acts she wished to do with Sarah, and expressed sexual and emotional desire for her.

196. Given Sarah's childhood, she craved this type of attention and desire and fell prey to Lainey's trap.

197. Lainey encouraging other adults to message Sarah, a 14-year-old child:



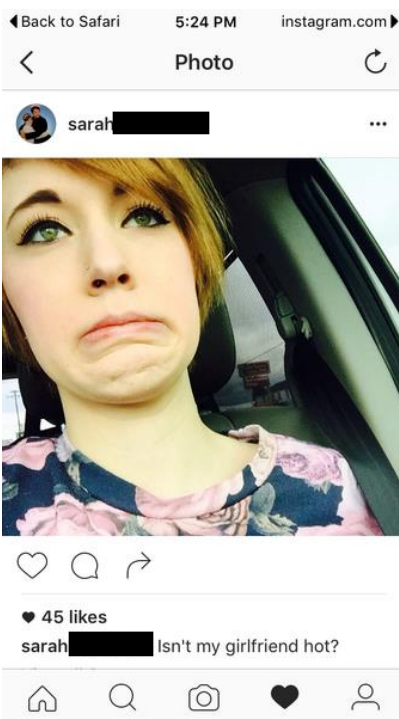
198. During this time, Sarah also began speaking to Onision in addition to Lainey.

199. In January of 2015, Sarah changed her username to "Jailbait," acknowledging the ongoing sexual nature of the communications with herself as a minor child and the legal risks it posed to Lainey and Onision.

200. As depicted, Jackson's commentary, inclusive of Onision, contained a sexual connotation, such as "INTO THE DUNGEON":



201. In 2015, Lainey and Sarah were speaking romantically and would refer to each other as “girlfriends” on social media:



202. Over the spring of 2015, Lainey tweeted Sarah and Regina many sexual and flirtatious comments, to include:



AGE 15

203. Sarah turned 15 years old on in August of 2015, making her 14 years old when she received these messages.

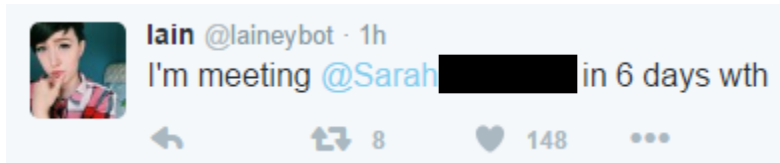
204. After months of grooming and her own vulnerabilities, Sarah's young, undeveloped mind believed that she was "in love" with Lainey.

205. In the summer of 2015, Lainey came out officially as "bi-sexual."

206. Onision informed Lainey that she could have a "girlfriend." The couple posted videos advertising the same.

207. Shortly before Sarah turned 16 years old, Lainey and Onision invited Sarah to visit them at their home in Washington State.

208. On or about September 9, 2016, Lainey posted online that Sarah was visiting her and Onision:



209. When the online community objected and flagged how inappropriate this was, Lainey called Sarah. In that call, Lainey propositioned Sarah, telling her it was illegal for them to have sexual intercourse based on Sarah's age, but suggested they could just "kiss" or "make-out" instead.

AGE 16

210. On September 15, 2016, one month after her 16th birthday, Sarah flew to Gig Harbor, Washington to visit Lainey and Onision.

211. At this time, Onision was 30 years old, and Lainey was 21 years old.

212. When grooming a child, predators will often attempt to gain a child's trust by talking, playing, and interacting with them in a way consistent with peers of their own age (e.g. playing video games, talking about teen topics of conversation, etc.).³¹

³¹ *Keeping Kids Safe, How Child Sexual Predators Groom Children*, Michigan State University, (Nov. 15, 2020), available at <https://www.canr.msu.edu/creating-safe-environments/uploads/files/Final%20-%20Grooming%20Children.pdf>.

213. While at Lainey and Onision's house, Sarah felt that she, Lainey, and Onision had a great time and it was an escape from the life she knew at home.

214. Onision invited Sarah to play video games for hours and interacted with her the way another 16-year-old would engage.

215. Onision told Sarah that she was "mature" for her age and it felt like "hanging out with a 20 year old."

216. Sarah's visit was short and on or about September 20, 2016, she returned to Michigan.

217. A few weeks after Sarah's first visit, Onision and Lainey invited Sarah to return for a second visit and invited her to live with them permanently due to problems she was having at home.

218. Sarah's mother allowed her to do this and signed a medical and financial power of attorney over to Lainey. Sarah's mother also awarded Lainey guardianship of Sarah.

219. Because of the financial power of attorney, Lainey had full and complete control over Sarah's bank account until she turned 18 years old.

220. On or about October 26, 2016, Sarah returned to Gig Harbor, Washington and moved in with Lainey and Onision.

221. Child predators often attempted to desensitize their victims to sexuality and sexual topics. Additionally, predators will also initiate gentle touching in safe areas that become more and more flirtatious. This is done as an introduction to

facilitate future sexual contact as part of the grooming process.³²

222. Soon after arriving, Onision began frequently making sexually charged jokes to Sarah, to include explicit references and jokes about sexual topics and sexual acts.

223. The constant jokes effectively minimized the feeling that sex was taboo in the mind of Sarah at the time.

224. Onision soon began touching Sarah in small, yet suggestive ways.

225. During the first visit to their house, Onision touched Sarah's face and caressed her face in a sensual way.

226. While living at their residence, Onision and Sarah were together wearing only shirts and underwear (not pants). While Lainey was showering, Onision deliberately pressed his erect penis up against Sarah's buttocks, making her feel uncomfortable.

227. On yet another occasion, Onision was giving minor Sarah a back massage and began caressing and rubbing her buttocks in a sexual manner. He also reached around the front of her shirt and groped, fondled, and molested 16-year-old Sarah's breasts. Sarah felt extremely uncomfortable.

228. The couple engaged in three-way wrestling matches with Sarah, causing many body parts, to include Sarah's breasts and buttocks, to be deliberately touched

³² *Grooming: Know the Warning Signs*, RAINN (July 10, 2020), available at <https://www.rainn.org/news/grooming-know-warning-signs>.

and grabbed by Onision and Lainey under the guise of “wrestling.”

229. Onision would find reasons to touch or brush up against Sarah’s breasts, buttocks, or body and would cause his hand to linger, touching her continually until Sarah stepped back. This happened frequently, adding to the high sexual energy in the home.

230. Throughout her time living with Onision and Lainey as a minor, Onision would touch her legs, would tickle her, would hand feed her food, and would constantly comment on her body in a sexual way.

231. Onision and Lainey would frequently engage in sexual activity in a manner and at a volume so that Sarah could not avoid hearing or walking in on the act.

232. All of the touching and constant sexual commentary by Onision made Sarah uncomfortable, but she felt powerless to act.

233. Lainey, on the other hand, frequently made Sarah feel as though they might be further romantically involved in the future.

234. Lainey asked Sarah that if she and Onision ever got divorced, could Sarah and Lainey get married?

235. When Lainey and Onision would have fights, Lainey would frequently tell Sarah that it was “Zillow time” and they would review properties together under the pretense that this was the house they would move into when they ran away together.

236. Lainey also would frequently touch Sarah in a sexual or flirtatious way,

such as caressing her legs or tickling her.

237. When individuals on social media started realizing that this minor child was at Onision and Lainey's house, Onision attempted to control the narrative by recording a video titled "Sarah is Leaving."

238. On or about February 21, 2017, Sarah was sent back to Michigan by Onision and Lainey.

239. On or about April 5, 2017, Sarah was invited and returned to Onision and Lainey's home a third time for her third visit to their residence.

240. During the third visit, Onision vacillated by being calm, kind, and friendly, to being angry and mean to Sarah. This variance in attitude sewed discord and instability in Sarah, exacerbated her insecurity, fostered a desire to make her "online hero" like her, and caused her to question what she had done wrong.

241. Sarah returned to Michigan on or about April 13, 2017.

AGE 17

242. It is common with sexual predators that after he or she identifies their target victim, they begin to engage in manipulation. The next stage of child grooming "involves isolating the person, then creating a secret relationship with them, and the following stage is one where an abuser will initiate sexual control over the person, and later control over the relationship by demanding secrecy."³³

³³ Erin Corbett, *We Know Grooming is Predatory Behavior, But Why is it So Hard to Recognize?* Refinery29 (Aug. 20, 2021), available at <https://www.refinery29.com/en-us/2021/08/10636786/grooming-child-sexual-abuse-detection>.

243. On or about August 1, 2017, once the internet commentary had settled down, Onision and Lainey invited Sarah to return to their home again, but stated it must be a “secret.”

244. Sarah was 16 and turned 17 a few days after arriving in Gig Harbor.

245. During her fourth time at their residence, Onision began treating Sarah in a mean and belittling manner again.

246. Onision effectively broke down Sarah and caused her to feel unwanted, isolated, and alone.

247. Additionally, Sarah was not the only person with them at the home. Onision and Lainey invited multiple other people to visit for the purpose of engaging in three-way sexual encounters with these individuals.

248. The messaging sent was that Onision was kind, friendly, and liked those that were engaging in sexual acts with him – that kindness and friendliness was desperately wanted by Sarah.

249. Nonetheless, Onision’s “jokes” and inappropriate, sexual comments continued and eventually, Sarah worked up the courage to stand up for herself.

250. On November 4, 2017, Sarah finally told Onision that his comments and “jokes” made her uncomfortable.

251. This comment caused Onision to become enraged and he demanded that Sarah leave their residence.

252. Sarah was sent back to Michigan on or about November 7, 2017.

253. For the next eight (8) months, Sarah and Lainey continued to

communicate.

254. On or about July 4, 2018, Sarah traveled back to Gig Harbor for her fifth visit at Onision and Lainey's invitation.

255. Sarah was 17 years old. Onision and Lainey wanted Sarah to return to them as close to her 18th birthday as possible.

256. Upon arrival, Onision changed the way he spoke to Sarah. Instead of being distant, cold, and cruel in his words and demeanor, as he was before, Onision was now warm, friendly, and kind to Sarah. He even greeted her with a hug.

257. This drastic change in his attitude towards this vulnerable child by one of her guardians affected Sarah greatly.

258. Sarah admired and idolized Onision and desperately sought acceptance from him and Lainey.

259. Onision told Sarah when he saw her that she looked like the "girl next door who moved back home but was super-hot."

260. Sarah had felt like a yo-yo with Onision and Lainey over her teenage years. Not only were they her guardians, but Onision vacillated between kindness, silliness, cruelty, and rage. Further, the couple alternated between wanting and inviting Sarah to be with them and then cast her aside.

261. This constant variance and inconsistency caused Sarah to feel uncertain, it negatively affected her own self-image and self-worth, and it exacerbated her symptomology of fear, loneliness, and seeking of acceptance.

262. Although she was still a minor, Onision and Lainey made it known to

Sarah that they wished to engage in a three-way sexual act and/or relationship with her.

263. Further, Onision and Lainey propositioned Sarah to engage in sex acts with them.

264. Sarah returned to Michigan on August 25, 2018.

265. At some point around this time period, Lainey proclaimed that *she* was now a male and that this person would be using the name “Kai” moving forward.³⁴

AGE 18

266. Sarah was again invited back and travelled to Washington on or about December 12 – 29, 2018 to spend Christmas with Kai and Onision.

267. After Onision’s fans began protesting Onision and Kai’s grooming of Sarah, Onision and Kai both created separate videos denying the allegations.

268. Onision and Kai both coerced Sarah to create a video addressing the allegations.

269. In this video posted on January 9, 2019, Sarah stated that she did not engage in sexual relations while underage.

270. Sarah did not wish to lie and therefore only stated the literal truth.

271. In reality, Sarah was afraid that she would lose her friendship with Kai

³⁴ This complaint will begin calling the person formerly known as Lainey by his new name, Kai, and male pronoun, so as to be consistent with relevant evidence and communications to date. It should be noted that Lainey and Kai are the same person.

and she was afraid she would lose her ability to come to Onision and Kai's house – both things she valued greatly.

272. As soon as the video was posted, Onision and Kai invited Sarah to visit Gig Harbor again.

273. On or about January 10, 2019, Onision attempted to manipulate Sarah by conceding he'd been mean, promising to be kind, and then asking her to sign an NDA. Specifically Onision texted Sarah:

Jan 10, 2019, 2:42 PM

This kinda feels like the last big challenge before all our lives become what we want it to be/ everyone is happy.

I'm sorry for being so rude to you all these years. I hope you understand why I always distanced myself from you.

I'm so glad I finally feel comfortable being real with you and ending the rudeness.

But I am sorry.

Also I think I'll send you an NDA early so I can't talk about you publicly, nor do I want to in the future, your privacy is important. Will get it to you soon, unless you just want to wait till you visit again.

274. Sarah did not want to sign this document and made up excuses to dodge and avoid it.

275. Sarah was able to visit again without signing the NDA.

276. Sarah traveled and arrived in Washington on or about January 16, 2019.

277. On January 17, 2019, the second night after arrival, Sarah, Onision, and Kai were watching television on Onision and Kai's bed, as they had many times before.

278. Onision and Kai began kissing and quickly began having sexual intercourse next to Sarah on the bed.

279. Sarah was sexually inexperienced and was shocked by what was occurring.

280. Nonetheless, without asking permission or confirming consent, Onision pulled Sarah over to where he and Kai were engaging in sexual intercourse.

281. Prior to this moment, Sarah had not consented to sexual activity with either Onision or Kai.

282. Sarah began kissing Kai. While Sarah agreed to kiss Kai, Sarah did not intend to engage in any sex acts with Onision.

283. After kissing, Kai left the bedroom for a few moments, leaving Onision with Sarah.

284. Without consent, Onision immediately pulled Sarah's pajama bottoms off.

285. Sarah was petrified and did not want her pants pulled off.

286. She grabbed the sheet to cover her exposed body.

287. Onision physically grabbed the sheet and forcibly pulled on it, attempting to pull it off of Sarah. Sarah desperately pulled back, struggling to remain covered.

288. When Sarah resisted his attempts, Onision became angry that she was

not cooperating with him.

289. Sarah then attempted to reach for her pajama shorts while holding up the sheet. Onision, seeing what she was attempting to do, quickly grabbed the shorts and flung them across the room and out of reach.

290. Sarah remained stationery, gripping the covers over her body.

291. Thinking that Onision understood that she was not willing to engage in sexual acts with him based on the exchange that just took place, Sarah began kissing Kai again.

292. Without warning, Onision grabbed Sarah's leg.

293. Sarah resisted and pulled her leg back, making her refusal to his demands obvious.

294. Onision, not taking no for an answer, used more force and shoved Sarah in front of him.

295. Without hesitation and against Sarah's clear resistance to his advances, he attempted to first digitally penetrate Sarah, and then he vaginally penetrated Sarah from behind with his penis.

296. Sarah was petrified and she froze, unable to move her limbs.

297. Onision continued to rape Sarah for what felt like an eternity.

298. Sarah began to silently cry, with tears welling up in her eyes, while she was being raped.

299. During this entire incident, Kai did nothing to help Sarah.

300. The next morning, not knowing what to do, Sarah attempted to hide

downstairs. Onision found her and picked her up, hugged her, and lavished her with kindness.

301. Sarah did not know what to make of this.

302. Almost immediately after, Onision demanded she sign the NDA documents.

303. Sarah was uncomfortable, but executed them because she believe she had no choice after having been groomed for her teenage years, culminating in these moments of vulnerability and control. In other words, when her guardians told her to sign the NDA documents, she had been groomed and conditioned to obey.

304. Upon information and belief, Onision and Lainey's intent with the NDA was to protect themselves from the illegal grooming and rape of Plaintiff.

305. The NDA was not a valid contract.

- a. The parties did not have a meeting of the minds when it was signed.
- b. Sarah signed it under coercion and/or duress, as Sarah had been groomed and conditioned to obey Onision and Lainey's directives.
- c. The NDA lacked any consideration.
- d. The terms were vague, general, and undefined.

306. Even if the NDA had been contractually sound, it was also breached by Onision.

307. Sarah was sent home January 20, 2019.

308. In the days and/or weeks following Onision's execution of his plan to engage in sex acts with his target, Sarah, he made statements indicating how much he enjoyed engaging in sex acts with Sarah and Kai together, that he missed Sarah, he loved Sarah, and that he wanted to continue the polyamorous relationship.

309. Sarah, on the other hand, did not feel that she had engaged in a mutual and enjoyable act; rather, she felt confused, ashamed, and afraid.

310. Sarah did not know how to handle the emotions she was having and was still seeking acceptance and understanding from Kai and Onision.

311. Sarah returned to Gig Harbor on or about February 16 – 20, 2019 for her eighth visit. Onision purchased her flights.

312. On or about June 30, 2019, Sarah returned to Onision and Kai's house again for her ninth trip.

313. On the last night of her trip, the three engaged in sexual activity together.

314. On the trip back to the airport on or about July 8, 2019, Onision told Sarah she was "his girlfriend" now. Sarah felt incredibly guilty and used, however, this made her feel validated for the exploitation that had occurred to date.

315. On or about from July 17 – 23, 2019, Onision knew Kai would be out of town in New Mexico and therefore flew Sarah to their house to spend more time with him.

ONISION MANUFACTURE A STORY AND BEGAN VICTIM-SHAMING SARAH

316. After Sarah made a few ambiguous statements about what had

322. These videos were posted on YouTube and were available for public viewing.

323. In the first of these three videos, Onision falsely stated that:

- Sarah told Onision that she would “destroy his life” and would only agree not to “destroy his life with lying specifically if she got what she wanted.”
- Onision “broke up” with Sarah because he was being “sexually extorted.”
- Sarah was “paid” to lie “in association with Discovery Plus” and Chris Hansen.
- Discovery Plus and/or Blackfin paid Sarah “\$40,000” “for raping [him].”
- Sarah “raped [him].”
- Sarah performed “sexual extortion” which is “synonymous with rape.” Sarah “raped” Onision because she told him she would “destroy his life” or “hurt” him if he did not “sleep with [her].”

324. In the second of these three videos, Onision falsely stated that “Sarah is a rapist.”

325. In the third of these three videos, Onision falsely stated that:

- “[Onision] shouldn’t have dumped Sarah for raping [him].”
- “[Onision] should have let [himself] get raped” by Sarah.
- “[Onision] should have just left Sarah for raping [him] and not said

anything bad about her.”

326. Prior to posting this, Onision was given notice as to the defamatory nature of these statements. These videos were published after notice.

327. Onision has also published similar content on his Twitter feed.

328. On February 8, 2023, Regina Alonso, filed a lawsuit against Onision, Lainey, Google, and YouTube in the Middle District of Florida.

329. As soon as they became aware of the lawsuit, both Onision and Lucas Jackson (the person formerly known as Lainey and Kai) attempted to silence Sarah again by calling her and attempting to manipulate her to not file this lawsuit.

330. As a direct result of these defamatory statements made by Onision, Sarah has caused her reputational harm, she has been baited and harassed online, she is fearful to have a public social media account, she has been publicly humiliated, and emotionally and psychologically harmed.

YouTube Response

331. After Sarah moved in, word got out that a minor child had moved in with Onision and Lainey and many people on YouTube were not comfortable with this.

332. Many YouTuber's that were also part of the YPP began to speak about Onision on their own YouTube channels and media began to surface that Onision and his spouse Kai (formerly Lainey) were predators.

333. This culminated in a documentary that was released on Discovery Plus that featured Regina, Sarah, and another ex-girlfriend of Onision named Shiloh.

334. It was only after the publication of this documentary that YouTube

finally decided to demonetize Onision for violations of their policies on or about January 21, 2021.

335. YouTube stated to news outlet Tubefilter that “it took action because Onision violated the Partner Program’s Creator Responsibility guidelines. These mandate that partners not engage in behavior (either on- or off-platform) that can cause widespread harm to the YouTube community, and potentially damage the trust among creators, users, and advertisers.”³⁷

336. Notably, although YouTube took away Onision’s ability to make money, but did not remove him from the platform.

337. YouTube is still profiting from Onision’s content; it is simply not profit-sharing with him anymore.

CAUSES OF ACTION

COUNT I

VIOLATION OF THE TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT

**18 U.S.C. §§ 1591(a)(1) and 1595
(Defendants Onision and Lainey)**

338. Plaintiff realleges and incorporates by reference all prior and subsequent paragraphs as if fully incorporated herein.

339. Defendants Onision and Lainey knowingly used the instrumentalities

³⁷ Hale, James, *YouTube Removes Onision From Partner Program, Demonetizes His Channels over Child Safety Concerns*, Tubefilter (Jan. 20, 2021), available at <https://www.tubefilter.com/2021/01/20/youtube-onision-partner-program-demonetized/>.

and channels of interstate and foreign commerce to facilitate violations of 18 U.S.C. §§ 1591(a)(1) and 1595(a), occurring within the territorial jurisdiction of the United States.

340. Defendants Onision and Lainey's conduct was in or affected interstate and/or foreign commerce.

341. Plaintiff was a minor of 14 years old when the allegations began and the trafficking of Plaintiff continued and was ongoing until Plaintiff was 18 years old, whereupon it finally concluded.

342. Both Onision and Lainey knew, or were in reckless disregard of the fact, that Plaintiff had not attained the age of 18 for the times when Plaintiff was a minor during this trafficking activity.

343. Lainey groomed Plaintiff to believe there was a romantic connection between the two. Lainey also groomed Plaintiff, knowing Plaintiff admired and looked up to her as a celebrity.

344. Lainey, in coordination with Onision, then used that grooming to lure, recruit, solicit, and entice minor Plaintiff to travel to their house for the purpose of engaging in sex acts with her.

345. To further maintain power and control over Plaintiff, Lainey and Onision obtained power of attorney and guardianship over Plaintiff.

346. While an adult at the age of 18, after years of grooming, Sarah was pushed to participate in a "three-some" with Onision and Lainey.

347. While Sarah only agreed to engage in kissing with Lainey, Onision then

1595(a), occurring within the territorial jurisdiction of the United States.

354. Defendants' conduct was in or affected interstate and/or foreign commerce.

355. Plaintiff was a minor of 14 years old when the allegations began and the trafficking of Plaintiff continued and was ongoing until Plaintiff was 18 years old, whereupon it finally concluded.

356. Both Onision and Lainey knew, or were in reckless disregard of the fact, that Plaintiff had not attained the age of 18 for the times when Plaintiff was a minor during this trafficking activity.

357. Lainey groomed Plaintiff to believe there was a romantic connection between the two. Lainey also groomed Plaintiff, knowing Plaintiff admired and looked up to her as a celebrity.

358. Lainey, in coordination with Onision, then used that grooming to lure, recruit, solicit, and entice minor Plaintiff to travel to their house for the purpose of engaging in sex acts with her.

359. To further maintain power and control over Plaintiff, Lainey and Onision obtained power of attorney and upon information and belief, guardianship, over Plaintiff.

360. While an adult at the age of 18, after years of grooming, Sarah was pushed to participate in a "three-some" with Onision and Lainey.

361. While Sarah only agreed to engage in kissing with Lainey, Onision then used the opportunity to rape Plaintiff.

362. Lainey participated in the sexual acts while Onision and was therefore engaged in the act of raping Plaintiff.

363. YouTube was notified multiple times that Onision was harming young people with his platform, but continued to profit-share with him and did not curtail his harmful abuse of the Terms of Service and Community Guidelines.

364. Other YouTubers began making videos and asking YouTube to intervene because of the harm that was occurring specifically to Sarah when Onision and Lainey had moved this minor child into their home and were grooming her.

365. Defendant YouTube knowingly benefited, or should have known that it was benefiting, from assisting, supporting, or facilitating a violation of 1591(a)(1).

366. Defendant YouTube knowingly benefited from such participation by receiving financial compensation and/or something of value for its participation in the venture.

367. Defendants were collectively participating in a venture in which they knew or should have known was engaging in sex trafficking.

368. Plaintiff received something of value for engaging in sex acts; to-wit: Onision and Lainey allowed her to live with them, they paid for her travel to and from their house, they allowed her to participate in Onision's YouTube videos on his channel, and Lainey, acting in concert with Onision, showered Plaintiff with love and affection which was extremely valuable to Plaintiff.

369. Onision received something of value as part of the sex trafficking; to-wit: Onision was able to rape Plaintiff and achieve a sexual conquest over this young girl.

370. Defendants' conduct has caused Plaintiff serious harm including, without limitation, physical, psychological, financial, and reputational harm.

COUNT III

**CIVIL REMEDIES FOR PERSONAL INJURIES RELATED TO SEX
TRAFFICKING**

**18 U.S.C. §§ 2255 AND 1591(a)
(All Defendant)**

371. Plaintiff realleges and incorporates by reference all prior and subsequent paragraphs as if fully incorporated herein.

372. Defendants knowingly used the instrumentalities and channels of interstate and foreign commerce to facilitate violations of 18 U.S.C. § 1591(a), occurring within the territorial jurisdiction of the United States.

373. Defendants' conduct was in or affected interstate and/or foreign Plaintiff was a minor of 14 years old when the allegations began and the trafficking of Plaintiff continued and was ongoing until Plaintiff was 18 years old, whereupon it finally concluded.

374. Both Onision and Lainey knew, or were in reckless disregard of the fact, that Plaintiff had not attained the age of 18 for the times when Plaintiff was a minor during this trafficking activity.

375. At all relevant times to this lawsuit, Defendants Lainey and Onision were adults.

376. Plaintiff was a victim of sex trafficking, as set forth in 18 U.S.C. § 1591(a) which provides that any person commits a federal crime who:

“knowingly (1) [...] recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; or (2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in [the same],

knowing, or, [...] in reckless disregard of the fact, that means of force, threats of force, fraud, coercion [...] will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act [...]”

377. Lainey groomed Plaintiff to believe there was a romantic connection between the two. Lainey also groomed Plaintiff, knowing Plaintiff admired and looked up to her as a celebrity.

378. Lainey, in coordination with Onision, then used that grooming to lure, recruit, solicit, and entice minor Plaintiff to travel to their house for the purpose of engaging in sex acts with her.

379. To further maintain power and control over Plaintiff, Lainey and Onision obtained power of attorney and upon information and belief, guardianship, over Plaintiff.

380. While an adult at the age of 18, after years of grooming, Sarah was pushed to participate in a “three-some” with Onision and Lainey.

381. While Sarah only agreed to engage in kissing with Lainey, Onision then used the opportunity to rape Plaintiff.

382. Lainey participated in the sexual acts while Onision and was therefore engaged in the act of raping Plaintiff.

383. YouTube was notified multiple times that Onision was harming young

people with his platform, but continued to profit-share with him and did not curtail his harmful abuse of the Terms of Service and Community Guidelines.

384. Other YouTubers began making videos and asking YouTube to intervene because of the harm that was occurring specifically to Sarah when Onision and Lainey had moved this minor child into their home and were grooming her.

385. Defendant YouTube knowingly benefited, or should have known that it was benefiting, from assisting, supporting, or facilitating a violation of 1591(a)(1).

386. Defendant YouTube knowingly benefited from such participation by receiving financial compensation and/or something of value for its participation in the venture.

387. Defendants were collectively participating in a venture in which they knew or should have known was engaging in sex trafficking.

388. Plaintiff received something of value for engaging in sex acts; to-wit: Onision and Lainey allowed her to live with them, they paid for her travel to and from their house, they allowed her to participate in Onision's YouTube videos on his channel, and Lainey, acting in concert with Onision, showered Plaintiff with love and affection which was extremely valuable to Plaintiff.

389. Onision received something of value as part of the sex trafficking; to-wit: Onision was able to rape Plaintiff and achieve a sexual conquest over this young girl.

390. As a proximate result of Defendants' violations of 18 U.S.C. § 1591(a), Plaintiff suffered serious harm and personal injury, including, without limitation, physical, psychological, financial, and reputational harm.

391. 18 U.S.C. § 2255 provides that any person who is a victim of a violation of one of several federal laws prohibiting sexual offenses against children, including 18 U.S.C. § 1591, and who suffers personal injury as a result of such violation shall recover the actual damages such person sustains or liquidated damages in the amount of \$150,000, and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred.

392. Additionally, § 2255 authorizes the award of "punitive damages and such other preliminary and equitable relief as the court determines to be appropriate."

393. Plaintiff has suffered personal injury as a result of Defendants' violations of the federal laws listed in paragraph (a) of 18 U.S.C. § 2255.

394. Plaintiff intends to prove her actual damages as a result of each of the Defendants actions.

395. At minimum, Plaintiff intends to seek liquidated damages in the amount of \$150,000 against Defendants, as well as the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred, prejudgment and post-judgment interest, and such other relief as the Court deems appropriate.

396. 18 U.S.C. § 2255 contains non-limiting language which allows Plaintiff to remedy violations of 18 U.S.C. §§ 1591(a) and other criminal predicates under Chapter 110 that do not benefit from CDA 230 immunity.

COUNT IV

CIVIL REMEDIES FOR PERSONAL INJURIES RELATED TO COERCION AND ENTICEMENT

18 U.S.C. §§ 2255 AND 2422

(All Defendant)

397. Plaintiff realleges and incorporates by reference all prior and subsequent paragraphs as if fully incorporated herein.

398. Defendants knowingly used the instrumentalities and channels of interstate and foreign commerce to facilitate violations of 18 U.S.C. § 2422, occurring within the territorial jurisdiction of the United States.

399. Defendants' conduct was in or affected interstate and/or foreign commerce.

400. Defendants' conduct was in or affected interstate and/or foreign Plaintiff was a minor of 14 years old when the allegations began and the trafficking of Plaintiff continued and was ongoing until Plaintiff was 18 years old, whereupon it finally concluded.

401. Both Onision and Lainey knew, or were in reckless disregard of the fact, that Plaintiff had not attained the age of 18 for the times when Plaintiff was a minor during this trafficking activity.

402. At all relevant times to this lawsuit, Defendants Lainey and Onision were adults.

403. Plaintiff was a victim of sex trafficking, as set forth in 18 U.S.C. § 2422 which provides that any person commits a federal crime who:

“knowingly persuades, induces, entices, or coerces any individual to travel in interstate or foreign commerce, [...] to engage in [...] any sexual activity for which any person can be charged with a criminal offense, or attempts to do so,

[... or]

using [...] means of interstate or foreign commerce, [...] knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in [...] any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, [...]"

404. Lainey groomed Plaintiff to believe there was a romantic connection between the two. Lainey also groomed Plaintiff, knowing Plaintiff admired and looked up to her as a celebrity.

405. Lainey, in coordination with Onision, then used that grooming to lure, recruit, solicit, and entice minor Plaintiff to travel to their house for the purpose of engaging in sex acts with her.

406. To further maintain power and control over Plaintiff, Lainey and Onision obtained power of attorney and upon information and belief, guardianship, over Plaintiff.

407. While an adult at the age of 18, after years of grooming, Sarah was pushed to participate in a "three-some" with Onision and Lainey.

408. While Sarah only agreed to engage in kissing with Lainey, Onision then used the opportunity to rape Plaintiff.

409. Lainey participated in the sexual acts while Onision and was therefore engaged in the act of raping Plaintiff.

410. YouTube was notified that Onision was using their platform to groom, lure, persuade, induce, entice, or coerce children with his platform, but continued to

profit-share with him and did not curtail his harmful abuse of the Terms of Service and Community Guidelines.

411. Other YouTubers began making videos and asking YouTube to intervene because of the harm that was occurring specifically to Sarah when Onision and Lainey had moved this minor child into their home and were grooming her.

412. As a proximate result of Defendants' violations of 18 U.S.C. § 2422, Plaintiff suffered serious harm and personal injury, including, without limitation, physical, psychological, financial, and reputational harm.

413. 18 U.S.C. § 2255 provides that any person who is a victim of a violation of one of several federal laws prohibiting sexual offenses against children, including 18 U.S.C. § 2422, and who suffers personal injury as a result of such violation shall recover the actual damages such person sustains or liquidated damages in the amount of \$150,000, and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred.

414. Additionally, § 2255 authorizes the award of "punitive damages and such other preliminary and equitable relief as the court determines to be appropriate."

415. Plaintiff has suffered personal injury as a result of Defendants' violations of the federal laws listed in paragraph (a) of 18 U.S.C. § 2255.

416. Plaintiff intends to prove her actual damages as a result of each of the Defendants actions.

417. At minimum, Plaintiff intends to seek liquidated damages in the amount of \$150,000 against Defendants, as well as the cost of the action, including reasonable

attorney's fees and other litigation costs reasonably incurred, prejudgment and post-judgment interest, and such other relief as the Court deems appropriate.

418. 18 U.S.C. § 2255 contains non-limiting language which allows Plaintiff to remedy violations of 18 U.S.C. §§ 2422 and other criminal predicates under Chapter 110 that do not benefit from CDA 230 immunity.

COUNT V

CIVIL REMEDIES FOR CRIMINAL SEXUAL ASSAULT MCL §§ 600.5805(6); 750.520b; 750.520c (Defendants Onision and Lainey)

419. Plaintiff realleges and incorporates by reference all prior and subsequent paragraphs as if fully incorporated herein.

420. Defendant Onision committed a battery upon Sarah consisting of intentional, harmful, unwanted and offensive sexual contact upon her vaginal area.

421. Defendant Onision engaged in sexual penetration in which his penis penetrated Sarah's vagina.

422. Defendant Onision used force or coercion to accomplish the sexual penetration, and/or overcomes the victim through the actual application of physical force.

423. Defendants Onision was a member of the same household as Plaintiff.

424. Defendant Onision was in a position of authority over Plaintiff and used his authority to coerce Plaintiff to submit.

425. Defendant Lainey assisted and served as a principal to the same act, enabling and assisting Onision in committing a criminal sexual assault upon Sarah.

426. As a direct and proximate cause of the foregoing, Plaintiff has suffered psychological trauma, physical pain and suffering, fright and shock, and loss of enjoyment of life.

COUNT VI
DEFAMATION PER SE
MCL 600.2911
(Defendant Onision)

427. Plaintiff realleges and incorporates by reference all prior and subsequent paragraphs as if fully incorporated herein.

428. Defendant Onision uttered and published words imputing a lack of chastity, dishonesty, and criminality to Plaintiff in his “Goodbye” videos.

429. These videos were posted on YouTube on September 21, 2022 and were available for public viewing.

430. These videos were in fact viewed by many people.

431. In the first of these three videos, Onision falsely stated that:

- Sarah told Onision that she would “destroy his life” and would only agree not to “destroy his life with lying specifically if she got what she wanted.”
- Onision “broke up” with Sarah because he was being “sexually extorted.”
- Sarah was “paid” to lie “in association with Discovery Plus” and Chris Hansen.

- Discovery Plus and/or Blackfin paid Sarah “\$40,000” “for raping [him].”
- Sarah “raped [him].”
- Sarah performed “sexual extortion” which is “synonymous with rape.” Sarah “raped” Onision because she told him she would “destroy his life” or “hurt” him if he did not “sleep with [her].”

432. In the second of these three videos, Onision falsely stated that:

- “Sarah is a rapist.”

433. In the third of these three videos, Onision falsely stated that:

- “[Onision] shouldn’t have dumped Sarah for raping [him].”
- “[Onision] should have let [himself] get raped” by Sarah.
- “[Onision] should have just left Sarah for raping [him] and not said anything bad about her.”

434. Sarah has been discussed openly and frequently on online forums. Individuals have researched who Sarah is and harassed her as a result of Onision’s publications.

435. As a direct and proximate cause of the foregoing, Plaintiff has suffered damages to her feelings, which have formed as psychological and emotional injuries, emotional distress, and mental anguish.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs demand judgment against all the Defendants on each of the above-referenced claims and Counts and as follows:

- JURY DEMAND**

DATED: March 2, 2023

/s/ Lisa D. Haba

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